



IN THE UNITED STATES DISTRICT  
COURT FOR THE WESTERN DISTRICT  
OF VIRGINIA

Plaintiff: JOAN C. Ransome  
v.

CIVIL ACTION NO.  
7:08-CV-00403

Defendants: Prosecutor Randy  
Leach, Asst Prosecutor - Patrick C.  
Buchanan, Jr. Sgt. Jeff Herrick,  
Detective Patricia Farris, January  
Benson, Tanya Finney, Richard Via,  
James E. Finney, Gregory C. Phillips, Esq.  
Detective Dave Flynn

COMPLAINT

1) JOAN C. Ransome - Pro Se

1014 35th St NW

Roanoke, VA. 24017 Phone: (840) 342-6793 or 467-1765 - cell  
daughter's Letonia

2) Prosecutor Randy Leach  
305 East Main Street  
Salem, VA 24153

3) Prosecutor Leach violated Law code 18.2-424  
Perjury. On June 17, 2008, he asked Judge Swanson  
at Richard Via's sentencing to sentence him to only  
eight years for grand larceny and burglary because  
he helped the Commonwealth in Ransome's murder trial.

Judge Swanson gave him less than eight years. It was about four years for each county charge. He received a total of 40 years, suspended after serving 18 years for city, Salem, and county. He violated Code 18.2-436 Inducing another to give false testimony... Leach advised, counseled, and induced Richard Via from the first trial in June '07 to the March 24, 25th 2008 trial. He induced Richard to make false statements under oath. He had Richard to say that Leroy told him, that Tasha and ~~Leroy~~<sup>him</sup> had been snorting cocaine and she said she was leaving him. Leroy said "Nu Bitch" and hit her in the face with the gun and then shot her. Leach even had Richard to point his finger at the jury, as if he had a gun. Also, Richard had a statement in the discovery for June's trial that Leroy told him Tasha was out prostituting and he went out after her. Leroy was aware of his strangeness, when he was put in his pod in April '07. At least two or three times a week Richard would be called down to docket. Other inmates questioned him when he came back up. He would lie and say he was talking to his lawyer. It would be as late as 11:30 pm and even on a Sunday. Leach was involved with the inducing and advising James Finney. He probably bribed him with removing the two years probation in the county he has after finishing in Amherst.

(3)

James was induced to lie under oath by saying Leroy was in isolation cell 4K and he was in 4A. When he went to get cleaning supplies, he raised the flap on the door and talked to Leroy. Leroy told him he was glad Tasha was dead, because he had another girlfriend. Also he and Leroy were baptized together and he asked Leroy did he shoot Tasha in the face and he said "yes". Leroy has always been on 5B maximum security since he's been there. When he was put in isolation, it was on the 6<sup>th</sup> floor or behind the docket. James Finney was released May '02 from the county jail. That month, Greg told Leroy what James was testifying June 4<sup>th</sup>, that morning. He said James was saying that he passed Leroy and he asked him did he shoot Tasha in the face and Leroy said yes. Also, Leroy was given Richard Via's subpoena to testify against him on June 4<sup>th</sup>. Leroy put the subpoena to the glass and showed me. Leroy said a deputy came to him later that night after visitation and got it from him. Richard was sent to the Roanoke City Jail on that day May 31<sup>st</sup> and has been there every since. James also lied about being in baptism with Leroy. Leroy said there was only seven of them and he was not one. Leroy said he had never seen James Finney until the day in court. Leroy told me about Richard Via last April<sup>10<sup>th</sup></sup>. He said he could see the strangeness in his behavior, so he didn't communicate with him. Greg asked Richard did he like blacks at the trial and he said "no". Greg referred

(4)

to his 100% honky tattoo on his arm. Leach cancelled Richards charges for over a year, to give him the opportunity to testify against Leroy and be compensated for it through bribery. Every time Leroy's trial was postponed, Richards sentencing would be too. I followed him in the computer. The last two cancellations stated "medical exam pending". But at his sentencing nothing was mentioned about a medical exam or medical problem, because if he was too incompetent to testify for himself, how could ~~he~~ he be competent to testify against Leroy. I witnessed his sentencing on June 17, 2008 at 2:30pm in the Roanoke County Circuit Court, Room 4. ~~They~~ <sup>He</sup> probably promised to withdraw James two year probation, when he finishes serving a year in Amherst County for child support. That's where he came from to testify in Leroy's trial and told the courts where he ~~was~~ <sup>is</sup> now. Leach coerced January. ~~Leach~~ ~~really~~ He put a APB out on January Benson (white) in December 2006. He had her to make a statement that Leroy put the gun on her, then Tasha. Her statement caused Leroy's charges to be upgraded from involuntary manslaughter and reckless handling of a fire arm to premeditated first degree ~~murder~~ murder. January told her daughters cousin, who is black and he told me. She told him that it would have stayed involuntary manslaughter, but ~~once~~ she made that statement, it was put in ~~the~~ the newspaper the next day. Leach had detective Hemick threaten her with 30

(5)

years accessory and he too, if she did not say that Leroy shot Tasha point blank. The stress was so harsh that she succumbed to their requests to avoid jail. She told a relative, January had been put to the side and was not needed in the preliminary hearing January '07. Scott Geddes, Leroy's court appointed attorney told me and his father before the preliminary hearing started that the prosecution was using forensic science because one minute she and Keenan Waller saw something and then one minute they didn't. But on June 4th both were not there. Greg Phillips, Leroy's attorney asked Judge Doherty to give him an extension because he had a tip on how to reach one of Leroy's eyewitnesses. Buchanan stood up immediately and told the judge he had been looking for Keenan for six months. (lie) Judge Doherty gave Greg only 24 hours to locate him. Buchanan ~~the~~ Assistant prosecutor was prepared to go forward without January and Keenan that day. As soon as we left court that day, Leach and Buchanan instructed the police and detectives to get January and Keenan to testify June 5th. I witnessed them forcing and threatening January. on June 4th, I went over to Diondre Ingram's house to tell her what went on. She was one of the ~~wine~~ witnesses that was not subpoenaed. Greg did not subpoena anyone for the trial, not even me. As I was talking to her the entire parking lot was full of police cars and



(6)

detective cars in Shenandoah Village Apartment Complex, January Benson's mother Debbie Williams lived over there and they refused to let her go to work until she got January. Christina brought her over there in her dark green jeep. They met her at the jeep and forced her out. She started screaming immediately that she didn't want to testify. The detective shook his finger all in her face, telling her that he would give her 30 years accessory if she didn't go with them to the County courthouse and make a statement. A small, thin white female deputy kept saying to January, "Ain't no need in crying now", over and over again. They told January she could ride with them, but she told them that Christina will take her. The detectives and police enclosed Christina's jeep back and front. Also, that same day Leach and Buchanan instructed the detectives and police to go to Martinsville and get Keenan Waller (black). They went on his job in Martinsville, ~~pretend~~ pretended to be for the defense. They asked him questions about being Leroy's friend, testifying for him, and had he got in touch with his mother (me). He told me that he told them that he gave them his ~~number~~ number months ago to give me. Also they told him Greg was Leroy's lawyer and to call him. The number Keenan repeated to me was wrong. They gave him a fake defense paper to get him

(7)

to come to Roanoke. They offered him a ride, but he told them that he would get his own ride. When he got to Roanoke and went where they told him, he said one of the prosecutors, who was tall and medium weight (Leach) shook a hand held tape recorder all in his face. He told Keenan that you mean to tell me that you know no more than what you told us. That I can give you 30 years accessory. Keenan said that he told him, Man I told you it was an accident. Then he told ~~him~~ Keenan that he wanted him to say the same thing January was saying, that Leroy beat her up and then shot her. These statements from January and Keenan, the two jail inmates were told to Leroy on June 5<sup>th</sup> and he said Greg forced him to go "no contest." Greg mentioned to me that morning that Leroy needs to plead "no contest" because the jury would put him away based on the two eyewitnesses alone testimony. But these were lies. Keenan Waller called me a couple of days afterwards and told me how they did him. He also told me the true story of what happened in the motel room. His version was identical to Leroy's and I asked him to come visit me. When he visited, I asked him did he mind putting it on tape what happened. He said "no," because ~~I~~ want to clear myself. I told Keenan I would take the tape to Greg. At the time, Leroy had requested to drop his "no contest" plea and go to trial. His sentencing was scheduled for Sept. 18<sup>th</sup>. There was no set time. He was facing 20 years to life. But Greg listened to the tape

(9)

and got a court date for Sept. 5<sup>th</sup>. Before the tape he had not bothered to do anything. I wrote Leroy's request in a letter and visited him in person. He didn't respond until I visited him <sup>again</sup> and that's when he asked me, if I had new evidence, I told him about Keenan and the tape. He asked me to bring it in. Two days later, I returned with a copy of the tape. I have the original. Judge Doherty, myself, Greg, Leroy, Asst. Prosecutor Buchanan, and detective Farris heard the tape. Judge Doherty allowed Leroy to drop his plea and go to trial. His trial was scheduled for Nov. 26, 27<sup>th</sup> after Thanksgiving but Greg claimed to be sick and had it rescheduled to January 13, 14<sup>th</sup>, 2008. He postponed it again until March 24, 25<sup>th</sup>. From what I witnessed as far as Leroy's trial, he had all these reschedulings to give the prosecution time to prepare themselves for a bogus trial. Leach violated code 18.2-436 with the other witnesses too. He and Buchanan worked together and induced January, Keenan, Richard, and James to testify falsely. He had knowledge of the lies that Sgt. Herrick and detective Farris testified to. Leach was the head leader of this trial, but he tried to remain in the backseat in preparation of the March trial and assist Buchanan and Farris. He was aware of my concerns before this trial, because I wrote Judge Doherty a letter and he wrote me back stating he could not read it, but would send it to Leach and Greg. Also, the victim's mother Tanya Finney was induced, and counseled to lie about the kids, so the child endangerment charge



(9)

would stick Leach is also guilty of Law code 19.2-265.2  
Failure to provide discovery. ~~It~~ states that in any criminal prosecution for a felony in a circuit court, the attorney for the Commonwealth shall have a duty to adequately and fully provide discovery as provided under Rule 3A:11 of the rules of the Supreme Court. Rule 3A:11 shall be construed to apply to such felony and misdemeanor prosecutions. Leach did not provide discovery for either of Leroy's trials. Greg lied to me and told me, he did not have it. I requested the discovery numerous times at the request of Leroy. Leroy wanted him to bring it to him before trial, but yet Greg repeated the statements that were to be testified in the June trial. <sup>Greg</sup> ~~He~~ only hinted to me about certain issues, before the March trial. Leach violated Civil Discovery Rule 5.702 Importance of the Truth - When parties engage in discovery, answers to that discovery must be responsive, honest and complete. If they are not, and if the deficiency is the result of a deliberate attempt to avoid the discovery rules, sanctions under Rule 4:12 are appropriate.

(12)

Leach violated law code 18.2-441.1 Bribery of Witnesses and code 18.2-447 Giving bribes to... He gave a bribe to Richard via by having his sentencing for County charges reduced. Richard was advised on several occasions from Leach for preparation of Leroy's trial June 4th. He was deliberately put in Leroy's pod April 30 for the purpose of being a lying snitch to have his time reduced. It really paid off under false testimony. Leach knew January's life style as being a prostitute, so he even had Richard to make a statement for the June trial, and say Leroy told him. I do believe Leach bribed both jail inmates, and January. He promised each one of them something. It could have been in the form of money on their books, paying some of January's fines. She owed a total of \$146 in Montgomery County's general district court just for costs. But now it is not shown in the computer. She has no job. She is prostituting in Riner, VA. I did not know that you can change your statements for the same situation on two different occasions. James and Richard changed their statements for the June trial to totally different statements under oath for the March trials.

(11)

Assistant Prosecutor Patrick C. Buchanan, Jr.  
 305 East Main Street  
 Salem, VA 24153

2) Assistant Prosecutor Patrick C. Buchanan, Jr. violated Law codes 18.2-434. Perjury. Buchanan lied to the judge twice. On September 5, 2007 he lied to Judge Doherty about the reason the police and detectives were in Shenandoah Village June 4th, 2007. When I mentioned what I witnessed about January that day, he interrupted and told the judge it had to do with my family harrassing her. That lie was total out of context, because I don't have any family at the complex. Then on June 4th, he stood up and told Judge Doherty that they had been looking for Keenan Waller for six months. But they reach<sup>ed</sup> him within an hour or so, after we left court and the judge had only gave Greg 24 hours to find him. Buchanan also lied in his newspaper comments. The last newspaper article ~~was~~ was his lying statement about why heroy went "no contest" in June '07 and that Keenan was trying to be loyal to heroy because he was on the prosecution side first. That was a damaging article and comment that affected the jury's decisions. The jury went home deadlocked Monday ~~the~~ March 24th after deliberating for five or six hours until after 9 pm. Judge Doherty did not sequester them, but should have

(62)

because they made Leroy's trial high profile and no comment was to be published about the trial in the Newspaper until Wednesday March 26<sup>th</sup>, after his verdict. But Buchanan instructed Mike Allen of the Roanoke Times to do so, with Buchanan's damaging statement about Leroy's "no contest" plea. The jury did not have to return until 10:30 AM that Tuesday.

Newspapers come out as early as 5 AM. They had access also to television, radio, cell phones, etc, because it only took 30 minutes for them to deliberate and convict Leroy of all four charges. Buchanan deliberately had that newspaper article published with his damaging lying statement. The newspaper article is attached. His comment is irrelevant and false. He knew exactly what they did to get Keenan on their side ~~June 4<sup>th</sup>~~ June 4<sup>th</sup> and why. Also, how they got Greg to force Leroy into a "no contest" plea. Even Judge Doherty was not satisfied with Buchanan's comment about the "no contest" plea. He addressed the ones in court that morning, before the trial started and the jury entered. He said it reflected on him. But all he did was put it in Leroy's file. Buchanan violated law code 19.2-265.4 Failure to provide discovery. .... He violated also Law code 18.2-436 Inducing another to give false testimony... He assisted each in violating this code with Richard Via, January Benson, James Finney and was aware of the detectives' testimony. But his star witness that he advised, counseled and induced was

(13)

January Benson, the other eyewitness, she was definitely  
 coaxed by him. He had her to lie that she lived with  
 her mother, but she lived in motels mainly the Knight's  
 Inn on Thirlane prostituting for a black woman named  
 Serita. She stayed at Econo Lodge sometimes and the  
 Super 8 motel on Thirlane. He had her to lie and say  
 she took Tasha (victim) to her mother's to change clothes.  
 She wasn't with her mother, because her mother called  
 my house daily to get in touch with her. Her six year  
 old daughter that lived with her mother told me  
 her daughter missed her. Several times January  
 would tell me to tell her that she wasn't at my house,  
 but she would be right there on my front porch. She  
 would have Keenan, her boyfriend to bring her to  
 visit Tasha, because she was tired of being in the  
 room 24/7. This was practically every day the summer  
 of 2006. Tasha had the same clothes she put on  
 Wednesday Nov. 15<sup>th</sup> to pick up her WIC checks, she  
 did not change clothes, when she ~~to~~ and January  
 came to the house to pick up her kids <sup>after 9 pm.</sup> and had  
 the same clothes on Nov. 16<sup>th</sup> when she was shot.  
 Tasha, Leroy (son) and both grandchildren lived with  
 me, Tasha has been with us since Oct. 2, 2002. Both  
 children were born and raised with me, until her  
 death. Also, he had January to lie that ~~she~~ <sup>she</sup> had  
 called Tasha that morning and Tasha told her that  
 she and Leroy had been arguing and to pick up her



(14)

up at Diondra's house. She had to help him fabricate the lie as to how she got Tasha. The truth is that Tasha called me about 3 pm on Wednesday Nov 15th to tell me that she walked to Diondra's house on Lafayette Blvd to braid her hair. She had talked to Diondra from her cell phone at the WIC Church. My daughter took her there for her 11:30 appt. but could not bring her back, because she had to be at work at 1:30. Tasha walked from the church on Carroll Ave to Lafayette ~~Blvd~~ Blvd. Diondra lived on Lafayette in 2006. Diondra said January called Tasha's phone several times for her to go with her to a room and get high. Diondra said she decided to take the phone from Tasha and tell her that Tasha wasn't going anywhere until she finished her hair. But less than a half an hour, January shows up at Diondra's house and told her and Tasha how she got \$100 from this man by telling him she'll be right back for sex. Instead, she had Serita, who pimped her to drop her off at Diondra's. Serita paid for the room at Super 8 in advance for January. Also, she had made \$300 in all at the Econo Lodge on Orange Ave. Tasha called me shortly before 9 pm to ask me to have the kids dressed, because January was meeting Serita at Valley View for dinner. I volunteered to keep them because it was late, drizzling rain and they had

(15)

already eaten. But Tasha insisted on taking them, because I had kept them since 1 p.m. She asked me to have them ready, because they would be riding in a cab. I did get the baby dressed, the oldest one was already dressed. January came in the house and helped me. They left my house a little after nine. I was shocked to read in the newspaper that they checked in the motel around 9:30 p.m. But after Tasha's death, Diondra told me the truth. She said Tasha knew I wouldn't have approved of her taking the kids, especially due to the weather. This was not the first time she has visited January with the kids and there was no problem. I have even babysitted for her and Leroy, and Keenan and January have invited them. Tasha had been friends ~~for~~ with January for ten years, long before Leroy or I met her. She introduced Leroy to her and her boyfriend Keenan Waller at my house the summer of 2006. Buchanan had to know the truth, but had her make up a new lie as to how she got Tasha. He used her prostituting life style to fabricate the lies. Richard Vica and James Finney were to say in the first trial, June '02. Buchanan. He had January to lie and say the \$100 she had hidden in her wallet was money her uncle gave her in case she needed it. It was all she had

(16)

left, because she gave Keenan \$200 when he arrived at the motel with Leroy that morning. He told it on the stand, and she had told me on the phone a couple days after the accident. Keenan had just been bonded out by her friend Christina for assault and battery against January. He beat her at the Knight's Inn on Nov. 13<sup>th</sup>, pictures were taken. Also Keenan had a protective order against him. But when Tasha died Nov. 16<sup>th</sup>, his charges were removed in exchange for his statements against Leroy. He never had to appear in court for that charge. It's in the computer though. Doing this is bribery, even though he decided to tell the truth and testify for Leroy. He had January to lie and say that Leroy argued at her and Tasha, pointed the gun at both of them, then blocked Tasha from leaving by hitting her in the face ~~with~~ the gun, and then shooting her point blank. On two instances this was a lie. Masselo told Greg that she had no other marks on her, except the gunshot wound. He was the medical examiner. Also, in the preliminary hearing transcript Detective Kincaid said when he entered the motel room that he saw her legs showing from between the window and bed. So how could she walk from the door to that spot, after being hit and shot anyway. I have the

(m)

entire transcript. He had January lie that she stood over Tasha and tried to get her to response. January was actually sleep, high off pills, alcohol and cocaine, when it happened. Leroy and Keenan said she jumped up, screamed and ran out the room down the hall. She left the kids who were sleep in the other bed. Keenan said he had to get them one at a time. When January called me the morning of Nov. 16<sup>th</sup>, she was crying hysterically. I asked her where she was and she said down the hall. I asked her where did Leroy shoot her, and she said over and over, "I don't know Ms. Joan, but Leroy accidentally shot Tasha." I did not find out where Tasha was shot until my ex-husband, daughter and friends came to comfort me from the hospital. I am on oxygen and received my granddaughters from the motel around 11:00 AM that morning and couldn't get to the hospital. Buchanan violated law code 18.2-441.1 Bribery of witnesses and law code 18.2-447 when person guilty of bribery. This was definitely done for Keenan Waller at the beginning of the case, and more than likely for January Benson. She owes a lot of fines in Montgomery County General District Court for traffic violations - 2<sup>nd</sup> DWI and not reporting to VASAP classes. January remained loyal to the end for the prosecution,

(18)

by succumbing to their wishes to convict heronry.  
Buchanan violated law code 19.2-265.4

Failure to provide discovery (explained in Leach's).

It is the duty of the Court to impose sanctions upon deliberate attempt to use improper evidence - when it appears to a trial court that a party has deliberately attempted to introduce evidence, which it knows is improper or inadmissible, either because it was not disclosed during discovery or because it otherwise is inadmissible under rules of evidence, it is the duty and

responsibility of the Court to deter such inappropriate tactics by taking such action, imposing such sanctions, or granting such relief as it deems appropriate. Buchanan should be prosecuted to the full extent of the law and sanctioned. He should loose the license to practice law and his position as assistant prosecutor.

Because of the unjust and unfair wrong doings of him and Leach, my son heronry Ransome II deserves exoneration. Last,

Buchanan violated Civil Discovery Rule 5.702-  
Importance of the truth (explained in Leach's).



(19)

Detective Dave Flynn  
5925 Cove Rd  
Roanoke, VA 24019

(3) Detective Flynn violated Civil Discovery Rule 5.702 Importance of the Truth. When parties engage in discovery, answers to that discovery must be responsive, honest, and complete. If they are not, and if the deficiency is the result of a deliberate attempt to avoid discovery rules, sanctions under Rule 4:12 are appropriate.

Detective Flynn collected the evidence on the morning of Nov. 16, 2006 in Room 312. He also took several pictures of Leroy's cut on his right hand in room 315. But he did not testify at all in the preliminary hearing in January '07. He is mentioned in the transcript as the one who collected evidence, but did not testify. In the March trial he only showed the gun in court and still didn't mention about the pictures he took of Leroy's bleeding hand. This matter was deliberately kept out, because it would have proved that Leroy was unable to pull the trigger. Leroy said he couldn't make a fist, let alone pull the trigger. He should be sanctioned or prosecuted to the full extent of the law for withholding evidence favorable to the defendant.

(20)

Detective Flynn also collected for evidence on Nov. 16, 2006 three cell phones. One was Tasha's, her number was ~~404~~ in Leroy's cell phone numerous times that night. Also, the conversations she had for him to come join them. Leroy's cell phone was confiscated by him and Keenan Waller's phone. Flynn withheld this evidence also by not testifying in the preliminary hearing January '07 and only presenting the gun in Leroy's trial, March 24, 2008.

(29)

January Benson c/o Prosecutor Patrick Buchanan, Jr.  
305<sup>E.</sup> Main Street  
Salem, VA 24153

4) January Benson who actually lives in Riner, VA. I do not have her address or any means of getting it. Therefore, I would like for Buchanan to give it to her. He knows how to get in touch with her. He will be lying again, if he says he doesn't, because he had detective Farris to pick her up ~~at~~ and bring her to court in March. She is in violation of Law code 18.2-434-what deemed Perjury. Statements that she committed are explained in Buchanan's allegations, which were her statements induced, counseled, coaxed and advised by him. I would recommend her to be prosecuted to the full extent of the law.

4) Richard Via  
324 Campbell Ave SW  
Roanoke, VA 24016

5) Richard Via violated Law code 18.2-434-what deemed Perjury. He was induced, coaxed, advised, and counseled to testify to lying statements on the stand in March. He lied that Leroy told him that he and Tasha had been snorting cocaine, and

(29)

she told him that she was leaving. Then Leroy said to Tasha, "No bitch" and point the gun to her face and shot her. He even demonstrated to the jury how he shot her by pointing his finger to the jury. He also had a lying statement prepared for the June trial. It had to have been on the "motion of discovery" that Greg refused to let Leroy see before trial but told Leroy the morning of his trial June 5th that Tasha was out prostituting and Leroy went after her. He needs to be prosecuted to the full extent of the law <sup>in</sup> addition to the bribery sentence he received from Leach and the county. He violated law code 18.2-441.1 - Giving bribes or receiving bribes...

James E. Finney c/o Amherst County Jail

115 Taylor Street

Amherst, Virginia 24521

6) James Finney violated law code 18.2-434 - What deemed Perjury. James Finney testified under oath to two lying statements on March 24th in Leroy's trial. He was coaxed, advised, and induced by Buchanan, and any other prosecution such as Leach and Detective Farris. Farris worked with Buchanan and had the opportunity to get him involved, because she worked very closely with Tanya Finney who is the victim's mother and estranged sister-in-law of James. James was just released from the county.

(23)  
(3)

jail in Moyon. He was not included in Leroy's trial in June '07 until June 5th. He made a lying statement that as he and Leroy was passing one another, he asked Leroy did he shoot Tasha in the face and he said yes. But in the March trial, he testified under oath with a total different lie. James said that he was in 4a and Leroy was in isolation in 4k. As he was getting cleaning supplies, he raised the flap on the door and had a conversation with Leroy. He said Leroy told him that he was glad Tasha was dead, because he had another girl friend. Also, as they were getting baptized, he asked Leroy did he shoot Tasha in the face and Leroy said yes. The first time Leroy saw James was in the courtroom March 24th. He was not on fourth floor with him because he was in maximum security on 5th floor in 5B. If he went into an isolation cell, it was on 6th floor or behind docket. Also, when baptized, there were only seven of them, and James was not one. He was advised and coaxed by the prosecutors, because of the drugs involved and the lying assumption that Leroy had another girl friend. <sup>Leroy</sup> He was questioned on the stand about another woman so they helped him and Richard fabricate lies. They used January's lifestyle which was prostituting for the June trial.



(23)

Tanya B. Finney  
 1201 Stewart Ave S.E.  
 Roanoke, VA. 24016

⑦ Tanya Finney Violated Law code 18.2-434 What deemed perjury. She was not in the preliminary hearing nor in the postponed trial on June 4th. She was induced, coaxed, and advised to testify falsely in Leroy's March trial. She committed perjury by stating that the Kids were brought to her from the motel and the 9 month old had blood in her ears. That was definitely a lie. The Kids were brought to me the morning of the 16th of Nov. by Charmaine Ware around 11:00 AM. They were given to her by Christy Ferrell who was the Clerk at the front desk. She went to room 312 to assist Leroy with Tasha until the paramedics arrived. They were not given to Tanya until 8:30 PM that night the 16th. My granddaughters, deceased mother and my son lived with me. No one at the motel knew Tanya or where she lived. January knew her, but not where she lived. Her son Theodore sat right there in court and knew his mother was lying. He came to my house, after Tasha had passed to see the Kids. He didn't communicate with me or the 3 year old. He just sat on my love seat and hugged her real tight. The baby was across the street with her god mother. Her son went to Family Dollar with my money to get

(25)

more pampers. Tanya called me later on that day to get the kids for awhile. I gave them to her at 8:30pm, and she never returned and was granted full custody on February 21, 2007. I gave in to her and did not contest it, before the court date. I recommend she be prosecuted to the full extent of the law.

Detective Patricia Farris  
5925 Cove Rd  
Roanoke, Virginia 24019

(26) Detective Farris violated law code 18.2-434-  
What deemed perjury. She testified under oath that Leroy told her on the day of the accidental shooting that he and Tasha had been arguing over her Burger King check. That was a total lie. If it had any truth to it, January especially would have mention it in newspaper comments and in her testimony. She got that lie from Tasha's mother Tanya. She was more interested in getting hold of Tasha's last check than her death. She put out that lie, because it was told to me. Farris used it as a motive. Also, she lied and tried to get a third jail inmate in the case. She went to the jail looked on the computer to see who Leroy's roommate was and called Jason Mabes (white) down to the visitation area. He had been Leroy's roommate for

(26)

only three days. He was taken out of Leroy's pod for fighting someone else. Detective Farris had him to sit at a long table in the corner of the visitation area where the inmates were behind the glass. Jason said he didn't know who she was, but she had on a gun and badge. Also, she was a tall, thin blonde. She asked him to help her and she would help him. She wanted to know if he knew anything about Leroy Ransome's case. Jason said, only that it happened at a motel. He was thrown off by the first name, because they only use last names in the pod. She gave him her card and told him to call her, if he knew <sup>more</sup> ~~more~~. Also, not to tell anyone about their meeting. He went straight to the other inmates, including Leroy's roommate and told them. After he found out who Leroy was he told him. When I went to visit Leroy that Thursday night, he had a visit next to Leroy. When the doors were open for them to go up, he came over and took Leroy's phone. He told me that he did not know I was his mother, because I taught him in middle school. I quickly asked him about the Farris visit and he pointed to the table and showed me the card. He said he wasn't going to do it, because he knew nothing. Jason is now in the penitentiary serving his nine years. She should be prosecuted to the full extent of the law.

(27)

She should be charged with bribery too, because James Kinney was coaxed by her. He claim in his testimony that he wrote her a letter about Levy's statements to him. But that was a lie. She induced him through Tanya, his estranged sister-in-law. She brought him in the case to strengthen it.

⑧ Sgt. Jeff Herrick  
5925 Cove Rd  
Roanoke, VA 24016

⑨ Sgt. Herrick violated law code 18.2-434 What-deemed perjury and 18.2-435 Giving conflicting testimony on separate occasions as to the same matter, sufficiency of evidence. It shall likewise constitute perjury for any person with the intent to testify falsely, to knowingly give testimony under oath as to the same matter or thing. Upon the trial on such indictment, it shall be sufficient to prove that the defendant, or witness, knowingly and with the intent to testify falsely gave such differing testimony and that the differing testimony was given on two separate occasions. Sgt. Herrick is guilty of both these violations, because he lied under oath by stating a statement that I made in juvenile and

(28)

Domestic Relations Court in the Roanoke City on June 6, 2006. He repeated my statement verbatim and said Leroy told him at the motel that day. The statement was that they had been arguing and having problems and they would take charges out on one another and then drop them. He had to review Leroy's file in the city to get that statement, this statement was not mentioned in the preliminary hearing testimony of him at all. I have the preliminary transcript in my possession. Scott Geddes, who was Leroy's court-appointed attorney at the time, asked him if he had any more information and did he tape his interview with Leroy. He said he had no more information on his interview and that he had taped his interview. He only spoke of Leroy's demeanor, which was crying and distraught, his bloody clothes, but did not recall seeing the cut alongside his index finger. Also, how Leroy demonstrated how the gun went off and Tasha's whereabouts. Geddes questioned him about not seeing the cut, because he used a GSR Kit to collect gun powder residue. He named the fingers tested, and the index finger was one. Sgt. Herrick threaten January and Keenan with 30 years accessory several times, until January decided to give in and testify falsely to avoid jail time.



(29)

Keenan continued to stick by his word that it was an accident and Leroy never pulled the trigger. Also, the magazine had fallen ~~on~~ the floor. He told them on the last threat June 4th to go ahead and do what they gotta do. Sgt. Herrick threaten Nicholas Cox, when he went to the motel to pick up his tracker jeep. He told him that he wasn't in the room and had only come to pick up his jeep. He lent Keenan the jeep to take Leroy to the motel that early morning. He should be prosecuted to the fullest extent of the law.

Gregory C. Phillips, Esq.  
 111 East ~~Main~~ <sup>Clay</sup> Street  
 Salem, VA 24153

10) Gregory Phillips-Leroy's paid attorney did not have an attorney-client relationship with him. Greg used me as a mediator to furnish information to the prosecution. He did not communicate with Leroy as an attorney should do. He did not visit him and talk about his side of the case at all. He only visited Leroy twice a day before his June 4th trial for 10-15 minutes and a day before his March 24, 25th trial. These were Sunday nights. He arrived for his March trial at 11:00pm and left 11:05pm. He has avoided communicating with him right now. I

~~(30)~~

(30)

called his secretary Stephanie the next day that he had been transferred to the Roanoke City Jail. He has not gone to see him at all and he has been there almost two months. Leroy saw him when he was in the gym playing basketball. He just stood there and watched him. When Leroy beckon for him to talk to him, he just put up four fingers and gave him a sneaky grin. I wrote him a letter with requests from Leroy on May 20th and hand-delivered it. I asked him to respond to me by sending a return letter, calling me, or having me come into his office. He did not respond. Leroy was requesting a retrial. I was actually a mediator, until I realized this after the trial. I provided him with all the facts of the case myself, except what happened in the motel room. Leroy told me and Keenan Waller what happen that morning and how it happened. I explained it to Greg. He would listen, tape it and tell me a lie that he was going to see Leroy that day. I was told that same lie on several visits without requesting it. Most of my requests for him to visit Leroy was on his cellphone, to his secretary on the phone. Leroy would call me and beg me to get him to come see him and show him the autopsy report, forensic evidence, "motion discovery", inner scope, any and all documents that the prosecution had.

(31)

~~(31)~~~~(31)~~

Greg would always have his voice mail ~~to~~ take the message and never call me back. I would leave long detailed requests and let him know it came directly from Leroy. Directions Leroy sent through me were never done. He wanted ~~Leroy~~ Greg to get the pictures of the cut on his hand, in both trials, he didn't. He lied to me the Friday, before the trial when I asked him again to get the pictures that he would get them that day. Stephanie said he got the phone records. That was at least two months before his trial in March, but he never mentioned them to me. I just took for granted that Stephanie told him that she told me on the telephone. In Leroy's first trial on June 4th, Greg forced him to go "no contest". Greg had not subpoenaed any of Leroy's nine witnesses, including me. He was not prepared for trial that day. He had ~~not~~ did any investigation of the case at all, nor talk to Leroy about it. He did not present a motion of discovery to Leroy, but could tell him who was testifying against him and what they were saying. He even told me that morning of the 5th that Leroy should go "no contest" because he had no chance with the statements of the eye witnesses. He couldn't defend Leroy any way. He was not prepared. He tried to get help from



(32)

me on the 4th. He sent me to Bryansteen to get the gun receipt that Leroy had the gun repaired - for being jammed. This was a numerous request before the trial. I went there, but the salesman said he could not give it to me, but Greg could come see him. Greg never did that day, or in his March trial. Greg subpoenaed all nine witnesses for the March trial. He only used two of us Christy Ferrell and eyewitness Keenan Waller. I found out why Leslie Spicer didn't show. Her apartment was where Leroy was when Tasha kept calling. He had been there playing the x-box and cards. Keenan Waller was there too, and her boyfriend Rashawn Brown. She was to testify to the calls, when he and Keenan left her apartment around 3 AM, and how Keenan called for Nicholas <sup>Cox's</sup> jeep to take Leroy to the motel. She was a key witness, but he had his secretary Stephanie to call her ~~the~~ <sup>two</sup> days before trial, that Friday. Stephanie told her that Greg said she did not have to come <sup>to</sup> trial on Monday, because she was only a character witness. She said she wondered about it, but didn't know why he considered her to be one. Also, Nicholas Cox who was testifying that Keenan called him to borrow his tracker jeep that night. Nicholas said he brought it to him, and Keenan took him back home. He said it was 3:30 AM, Greg was

(33)

working with the prosecution he did not put up any defense for Leroy. It was a one-sided trial. He kept me out of purpose, because he knew I could have attacked all of January Benson's testimony. Greg told me on the Friday before the trial that he wasn't going to use me, because of some damaging conversations between Leroy and myself on the phone. He did not want them exposed to the jury. I ~~was~~ was very puzzled as to what they were about, but he ~~couldn't~~ didn't tell me. It was a lie to keep me out of the trial. I went in the courtroom around 9 Am on the morning of March 24th. When I sat down, a deputy came from the back and told me I had to leave, because I was a witness. Greg was beckoning for me to go back out too. I did, but towards the end of the defense testimony, which only two witnesses were called plus Leroy. Greg came out into the waiting area and told me that he was putting Leroy on one more time and then arrest his case. I went in and sat down. I only heard the closing arguments and what Leroy said about the lying inmates. He kept Diondra Ingram from testifying. He lied and told her that morning he might use her. She had all the details of Tasha's visit and January coming to get her. Greg did not want her to testify to that, because it would



(34)

damage January's lying testimony. Greg worked along with the prosecution. He did not cross examine January at all, even when Massello caught her in a lie. The newspaper article is attached. He just said she went one lie too far. Greg did not defend or investigate Leroy's case. He did not get his own gun expert to compare findings. He did not use the three newspaper articles about guns and rifles going off without pulling the trigger. Leroy sent them to me to give to him and use in his defense. Greg only glanced at them and gave them back to me. These were all accidental and one child of 11 years was a rifle handler, in which the gun went off without pulling the trigger. But yet the gun expert emphasized it takes 9 pounds of pressure for Leroy's 9mm to go off and the magazine has to be it. Then he says guns do malfunction. He did not get others, such as forensic examiners to conduct findings so he could compare them. He did not subpoena his bloody clothes and shoes, nor his demeanor. All police and detectives did testify to the truth about his demeanor. They said he was very distraught and crying. He never talked to the witnesses before trial. I wrote down every thing they were testifying to in the first trial. He never called them in or subpoena them. In the March trial



(35)

the same ones were subpoenaed, but he never called them or have them to come on with an appointment. I told him in person before this trial, what they were testifying to. I was the only one, who communicated with him. It was definitely not my place to do it, but he kept lying about going to see him. He never discussed the case with him. All the information was through me, not knowing that it was being taken to the prosecution, so they could prepare themselves. That's why I was comfortable about staying out the trial, because he had all the information from me. Then he had the nerve to say to me that Friday before court that he just began to feel he could defend Leroy two days earlier. I demonstrated to him how the gun was handled by Leroy and how Leroy said it went off with no magazine in it and the trigger not pulled. Greg really used my evidence to prepare them. He knew he had a very good chance for winning an involuntary manslaughter charge and reckless handling of a weapon, but he did not care about Leroy at all. Leroy had done nothing to him. He did not cross examine the victim's mother about the children coming to her and the baby had blood in her ear. This was definitely to convict Leroy on two felony child neglect charges. He knew they lived with me

  
(36)

and I told him about Charmaine were bringing them to me that morning. This was repeated and written down for the June '07 trial and told to him before the March trial. Leroy and his father Leroy, Sr. requested through me on numerous occasions about a ~~bad~~ bond hearing. Also, putting him on the GPS system and that Leroy would be with him while on bond. He ~~was not~~ would grin at me and say Leroy didn't need a bond. Then on the last lie about not getting him ~~one~~ one was that he is charged with murder. But you know the story about the white man who deliberately shot a man 15 times was asked by Greg to get a bond. Even though it was denied, it was just the principle behind it. He showed favoritism. He disbelieved Leroy from the beginning. He tried very hard before the first trial to get Leroy to admit killing Tasha intentionally. He and the prosecution drew up their own motive as being heated passion. Greg told Leroy when he visited him after taking the case that Leroy just stayed on the scene to make it seem like an accident, but actually it wasn't. Greg even said to me the Friday before trial, "Are we going to fight this trial on heated passion or accidental

(37)  
(40)  
shooting. I said it was an accidental shooting and not heated passion. He loved her and knew of her friendship with January. I questioned Greg about not attacking Tanya getting the kids. He just replied with what he looks like questioning the victim's mother. He swears that the lying of the witnesses was the damaging, it was the newspaper article. Leroy had no defense in his trial. As I stated earlier, I was removed from the trial. But I wrote ~~the~~ Judge Doherty and requested to buy the transcript. His secretary wrote me back and said there was no transcript but I could make arrangement to view it on CD. On April 8th, I sat in Lois's office, Judge Doherty's supervisor and viewed my son's trial for five hours. I was so shocked until I didn't know if I could get the bus back home without suffering another heart attack. Other than the other detectives and the paramedics, the trial was dramatized and made up with lies from six prosecution witnesses. They took an accidental shooting and turned it into a premeditated first degree murder. Greg has violated law code 18.2 455 Unprofessional conduct revocation of license Conduct that is made illegal on the part of an attorney at law or any person holding

license from the Commonwealth to engage in a profession is unprofessional conduct. If the defendant ~~is~~ be found guilty ~~his~~ of barratry, his license to practice law or any other profession shall be revoked for such period ~~by~~ as provided by law. Greg had definitely existed unprofessional conduct. I referred his misconduct to the Virginia State Bar last week. Greg has also violated Civil Discovery Rule Chapter 5-5.504 Preparation of the Favorable Witness or Client. The attorney shall also prepare his or her client by discussing anticipated areas of questioning by opposing counsel. Through preparation includes reviewing and confirming the correctness of answers by interrogatories and discussing subpoenaed documents, documents procured by the opponent, and documents counsel has produced. Leroy requested these documents numerous times by me. They were requested in writing, on his cellphone, and to his secretary. Also in person, but he never responded. Greg violated Civil Discovery Rule Chapter 5-5.202-Importance of the Truth. When parties engage in discovery, answers to that discovery must be responsive, honest, and complete. If they are not, and if the deficiency is the result of a deliberate attempt to avoid the discovery rules, sanctions under



(39)

Rule 4:12 are appropriate. The only discovery that Greg had was from the prosecution. The truth discovery; he was interested in. He withheld evidence to defend me, such as the telephone records, gun repair receipt that he never got, pictures of the cut on his hand.

Your honor, I have ~~assess~~ exhausted all means of getting relief for my son Leroy Ransome II. Last year, I wrote Senator Warner, NAACP, ACLU, Virginia State Bar- Asst. Prosecutor Patrick Buchanan at that time. I was told in a reply letter that he is chosen by the people and does not have the same rules to be governed by as a lawyer. ACLU acknowledged the fact I had serious allegations, but they did not have the funds to investigate. Senator Warner referred the matter to the Commonwealth and Leroy to his attorney. This year I have more allegations, but each person I wrote was not allowed to intervene. They all referred Leroy to turn his problems over to his attorney, but how could he. They had no attorney-client relationship. I wrote Bob Goodlatte, Bob McDonnell, J. Jacobsen and Senator John Edwards. McDonnell sent the copy of my letter to Leach and Greg. I even wrote Judge Doherty. I didn't mention the verdict, conviction or about the sentencing.

(41)

(X)

I only spoke on how Leroy has been treated for an accidental shooting. Your honor, these unfair unjust allegations have put a toll on my health and Leroy's. He is so frustrated about facing 32 years for an accidental shooting that was dramatized and made up to be murder, I just pray every night and day that he will survive. He has spent time in Roanoke Memorial for diverticulum attacks. Any future attacks, he was told will lead to part of his intestines removed. He has developed high blood pressure. Remarks made about him in jail especially in the County by deputies behind his back and inmates who were not punished for it has had a detrimental effect on him. Also, it bothers him thinking about how people see me or relate to me now, thinking he is a cold blooded murderer. Moreover, he is definitely grieving over his daughters, because he will never see them again. He cries constantly over the loss of Tasha and his kids. He cries over me because I am 59 years old with health problems such as diabetes, hypertension, heart disease. I had a double by pass in Sept '05 after a heart attack. It left me with a lung disease pulmonary hypertension. I am on two liters of oxygen for the rest of my life. This burden

is so heavy, I can barely function. My  
 sugar stays high and I have lost 4 lbs. from  
 just depression. I love my oldest son and I  
 loved Tasha. She was in my son's life for  
 four years, Oct 2, 2002 to Nov 15, 2006. They  
 have two beautiful daughters that were born  
 and raised at my house. They are my other  
 burden. Tasha's mother got full custody of  
 them on Feb. 21, 2007. I gave up the fight to  
 keep them, because of my health I thought  
 I would lose. But I'm tired of supervised  
 visitation for one hour twice a month.  
 Everything was just snatched away from me  
 all at once. Leroy tells me on several occasions  
 that I will be probably dead and his father too.  
 Also, he will be 63 years old, if he lives that  
 long. I am not in the best of health to  
 visit him in the penitentiary. While he's still  
 here, I have missed less than ten times visiting  
 him in Roanoke County and Roanoke City none  
 so far. I have to carry a 10 lbs tank in a bag.  
 It affects my walking, but I do it, just to see  
 him as long as I can. What's eating at me is  
 how they did him to get him so much time.  
 Greg helped them. He took his father's money  
 and did nothing for him, but stay in the dark  
 from him, so he wouldn't be able for any-

thing they would say to each other. But God  
 guided me to this point. I just thought  
 about the McMillian case and wanted to find  
 out if I could get a case and justification  
 for me and my son. I was used as a mediator,  
 false evidence that reflected on me. I have  
 a hard time dealing with people. They look  
 at me as if to say, they are sorry for what  
 I'm going through, but behind my back based  
 on his conviction that I raised a murderer.  
 I pray your honor that you will grant me  
 the relief of seeing my son exonerated, because  
 of the perjury unfairness and injustice he has  
 gone through for a wrongful conviction. Money  
 is something I've never had in large quantities,  
 but due to the injustice and unfairness that I  
 have suffered I am suing both prosecutors for  
 \$100,000 each, both detectives for \$250,000 each,  
 and attorney Greg Phillips for \$75,000. Also  
 detective Flynn for \$250,000 for compensatory  
 and punitive damages. Above all of this, my  
 son's freedom is the most important to him and  
 me, to hold him in my arms and we share my  
 last days on earth together. I have documents also.

Your honor, thank you for your time and consideration  
 concerning this matter.

Sincerely,  
 Joan C. Ransome - Pro Se